

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Amy M. Acquaviva	:	Chapter 13
	:	No.: 21-11387-ELF
Debtor	:	

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY M&T BANK

Debtor, Amy M. Acquaviva, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by M&T Bank hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. The Debtor proposes to cure the arrears by having their attorney holding \$2,900.00 by the hearing date with the remaining balance of post-petition arrears to be paid over six monthly payments beginning with the October 2021 mortgage payment.
7. Admitted.
8. Admitted.
9. Denied.
10. Admitted.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Respectfully submitted,

Dated: September 1, 2021

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
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